Donald J. Kennedy Gary D. Sesser CARTER LEDYARD & MILBURN LLP 2 Wall Street New York, NY 10005 Tel: (212) 732-3200 Fax: (212) 732-3232 Attorneys For Defendant Regalindo Resources Pte Ltd. UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK SEATREK TRANS PTE LTD., Plaintiff, 08 CIV 00551 (LAP) v. **NOTICE OF MOTION** REGALINDO RESOURCES PTE LTD., Defendant.

PLEASE TAKE NOTICE that upon the accompanying memorandum of law, Defendant Regalindo Resources Pte Ltd. will move this Court on a date to be determined by the Court, before the Honorable Loretta Preska, United States District Judge, for reconsideration of the Court's March 26, 2008 Memorandum and Order in this case (the "Order") pursuant to Southern District of New York Local Civil Rule 6.3 and, in the

alternative, for amendment of the Order to include certification for interlocutory appeal pursuant to 28 U.S.C. § 1292(b).

Dated: New York, New York April 8, 2008

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CERTIFICATE OF SERVICE

I am over the age of eighteen years, am not party to this proceeding and am employed as an Assistant Managing Clerk with the law firm of Carter Ledyard & Milburn LLP. I hereby certify that on the 8th day of April 2008, I caused true and correct copies of the annexed Notice of Motion to be served by mail upon the following:

JEREMY O. HARWOOD Blank Rome LLP The Chrysler Building 405 Lexington Avenue New York, New York 10174 KEVIN L. MCGEE Rawle & Henderson LLP The Widener Building One South Penn Square Phildadelphia, PA 19107

Antonio Malaspina